

CompTel Policy Objective #1:

Local Access

- UNE Demand (CC Docket No. 96-98)
 - CompTel Petition for Reconsideration asks the FCC to increase the availability of unbundled local switching (ULS)
 - CompTel has urged the FCC to expand the number of lines on which competitors can provide service using ILEC ULS (i.e., the Unbundled Network Element Platform, or “UNE-P”)

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- *Enhanced Extended Link (“EELs”)*
(CC Docket No. 96-98)
 - *CompTel v. FCC, Case No. 00-1272, appeals the FCC’s interim use restrictions on the use of EELs (loop-transport combinations)*
 - *CompTel will oppose permanent use restrictions on the use of UNEs and UNE combinations*

CompTel Policy Objective #1:

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- Collocation Demand

(CC Docket No. 98-147)

- ILECs must allow competitors to collocate any equipment “necessary” for interconnection or access to UNEs
- CompTel has proposed that the FCC define “necessary” as any equipment or practice that allows a competitor to increase its “collocation throughput” (i.e., interconnection or number of UNEs accessed from a given collocation)

CompTel Policy Objective #1:

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- *Line Sharing/Line Splitting*
(CC Docket Nos. 98-147; 96-98)
 - *CompTel advocates the competitive availability of unbundled access to the high-frequency portion of the local loop*
 - *CompTel Petition for Reconsideration/Clarification asks the FCC to clarify certain issues in its recent “Line Splitting Order”*

Comptel Policy Objective #1: Local Access

- *New Networks Proceeding/ Project Pronto
(5th and 6th FNPRMs, CC Docket No. 97-
98)*
 - *Comptel has championed competition in the
burgeoning market for advanced services*
 - *FCC has initiated a proceeding on Comptel's
Petition for Reconsideration of SBC's
proposed "Project Pronto" fiber-fed, next-
generation digital loop carrier overlay network*

CompTel Policy Objective #1: Local Access

Section 271

- *Verizon Section 271 Application for MA*
(CC Docket No. 01-9)
- *CompTel reiterated Members' concerns about poor trunk and special access provisioning*
- *CompTel asked the FCC to impose performance monitoring for special access on VZ and its interLATA affiliate*

CompTel Policy Objective #1:

Local Access

- *Cable Open Access
(GN Docket No. 00-185)*
 - *CompTel has called for “minimum cable open access rules” to ensure competitive providers of advanced telecommunications and information services have access to facilities operated by incumbent cable service operators*

CompTel Policy Objective #2: Competitive Broadband Access

- *CompTel has proposed a forward-looking national broadband policy:*
 - *eliminate local broadband access bottlenecks*
 - *keep Internet free from unnecessary regulation and open for business to all*
 - *promote meaningful industry self-regulation as preferred approach to address consumer concerns*

CompTel Policy Objective #2: Competitive Broadband Access

- *CompTel vigorously opposes the very real threat of the anti-competitive Tauzin/Dingell bill:*
 - *CompTel has met with numerous Members of Congress and their staffs to convince them to resist joining the Bells' legislative efforts and to support our alternative, pro-competitive legislation, which advocates UNES, increased enforcement and structural separation*

CompTel Policy Objective #2:

CompTel's Federal Broadband Advocacy:

"Break the Bottleneck" Strategic

Communications and Grassroots Lobbying

Campaign (700 letters to Congress in FL)

- Annual Legislative Conference (April 19-21)

Kingsmill Resort, Williamsburg, VA

- Competitive Broadband Coalition (CBC)

- No-Name Coalition

- Voices for Choices

CompTel Policy Objective #3: Fair Compensation

- As the umbrella association of competitive carriers, CompTel advocates for cost-based ILEC access charges for circuit-switched voice traffic; champions the right of CLECs to reciprocal compensation; and defends against efforts to impose legacy-based access charges on evolving packet-switched technologies (e.g., VoIP, VON)

CompTel Policy Objective #3: Fair Compensation

- *Reciprocal Compensation for ISP-Bound Traffic (CC Docket Nos. 96-98; 99-68)*
 - CompTel has argued that the FCC should not cause unnecessary financial hardship to the competitive industry by radically changing this aspect of inter-carrier compensation
 - CompTel believes that “bill and keep” is inappropriate, illegal and bad public policy if imposed for only one type of traffic

CompTel Policy Objective #3:

Fair Compensation

- *Inter-Carrier Compensation NOI*
 - *CompTel is formulating its position for the FCC's expected Notice of Inquiry (NOI) on inter-carrier compensation*

CompTel Policy Objective #4:

Structural Separation

- *CompTel believes that the RBOCs should be split into separate retail and wholesale affiliates. Structural separation:*
 - minimizes or eliminates the inevitable conflict that results from an RBOC's dual competitor/supplier role
 - creates a level playing field
 - in the long-term, reduces the need for regulation

- *CompTel has led the industry in spearheading the issue of structural separation as the ultimate tool to speed the opening of local markets:*
- *Frisby NARUC Speech*
- *Pennsylvania PUC Version Order*
- *Capitol Hill*

CompTel Policy Objective #4: *Structural Separation*

CompTel Policy Objective #5: International Market Access

- *As early as 1996, CompTel was the first association to form an International Communications Committee, reflecting the association's ongoing commitment to competition on a worldwide scale, and to help its members navigate the often-complex rules, regulations and business practices of U.S. overseas trading partners.*

CompTel Policy Objective #5: International Market Access

- *CompTel is actively urging policymakers to ensure that other countries satisfy their commitments under the World Trade Organization (WTO) Basic Telecommunications Agreement*
 - *CompTel 2001 USTR Section 1377 Telecom Trade Review Comments (Germany, Mexico, South Africa, Japan and Taiwan)*